

John E. Flaherty  
Jonathan M.H. Short  
Carissa L. Rodrigue  
MCCARTER & ENGLISH, LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102  
(973) 622-4444

*Counsel for Plaintiffs AstraZeneca AB,  
AstraZeneca LP, KBI-E, Inc., and Pozen Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ASTRAZENECA AB, ASTRAZENECA LP,	)	
KBI-E INC., and POZEN INC.,	)	CIVIL ACTION NO. 11-cv-02317-JAP-DEA
	)	(CONSOLIDATED FOR DISCOVERY
Plaintiffs/Counter-Defendants,	)	PURPOSES WITH CIVIL ACTION
	)	NOS. 11-cv-04275-JAP-DEA AND
v.	)	11-cv-06348 JAP-DEA)
	)	
DR. REDDY'S LABORATORIES, LTD. INC.	)	<b>Motion Day: September 17, 2012</b>
and DR. REDDY'S LABORATORIES, INC.	)	
	)	<b>PLAINTIFFS' NOTICE OF MOTION FOR</b>
Defendants/Counter-Plaintiffs.	)	<b>LEAVE TO AMEND THEIR RESPONSE TO</b>
	)	<b>DRL'S INVALIDITY CONTENTIONS</b>

TO DR. REDDY'S LABORATORIES, LTD. INC., DR. REDDY'S LABORATORIES, INC.  
AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Plaintiffs-Counterclaim-Defendants AstraZeneca AB, AstraZeneca LP, KBI-E Inc. and Pozen Inc. (collectively, "Plaintiffs"), will move before this Court at the United States District Court for the District of New Jersey, 402 East State Street, Trenton, New Jersey, on September 17, 2012 at 10:00 a.m. for entry of an Order granting Plaintiffs' motion for leave to amend their Responses to Dr. Reddy's Laboratories, Ltd. Inc. and Dr. Reddy's Laboratories, Inc.'s (collectively, "DRL") Invalidity Contentions Pursuant to L. Pat.

R. 3.6(i) to respond to the allegations of invalidity against all of the asserted claims of U.S. Patent 6,926,907 (namely, claims 1, 5, 9-17, 22-23, 35, 48 and 50-55.)

PLEASE TAKE FURTHER NOTICE that in compliance with Local Patent Rule 3.7, movant states that attorneys for Plaintiffs contacted the attorney for DRL, Alan Pollack, on two separate occasions but were unable obtain either consent or an objection to the relief sought by this motion.

PLEASE TAKE FURTHER NOTICE that Plaintiffs will rely upon the Memorandum submitted with this Notice of Motion, and upon all pleadings and proceedings on file herein.

PLEASE TAKE FURTHER NOTICE that a Proposed Order granting Plaintiffs' motion is attached.

Respectfully submitted,

Dated: August 17, 2012

s/John E. Flaherty  
John E. Flaherty  
Jonathan M.H. Short  
Carissa L. Rodrigue  
MCCARTER & ENGLISH, LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, New Jersey 07102  
(973) 622-4444

*Counsel for Plaintiffs AstraZeneca AB,  
AstraZeneca LP, KBI-E, Inc., and Pozen Inc.*

Einar Stole  
COVINGTON & BURLING LLP  
1201 Pennsylvania Avenue, NW  
Washington, DC 20004-2401  
(202) 662-5095

*Of Counsel for Plaintiffs AstraZeneca AB  
and AstraZeneca LP*

Stephen M. Hash  
VINSON & ELKINS LLP  
2801 Via Fortuna  
Suite 100  
Austin, TX 78746-7568  
(512) 542-8504Of

*Counsel for Plaintiff Pozen Inc.*

Henry J. Renk  
FITZPATRICK, CELLA, HARPER & SCINTO  
1290 Avenue of the Americas  
New York, NY 10104-3800  
(212) 218-2250

*Of Counsel for Plaintiffs AstraZeneca AB,  
AstraZeneca LP, and KBI-E Inc.*

### CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2012, I caused the foregoing PLAINTIFFS' NOTICE OF MOTION FOR LEAVE TO AMEND THEIR RESPONSE TO DRL'S INVALIDITY CONTENTIONS and supporting documents to be served upon the following counsel via electronic mail and the CM/ECF system:

Alan Henry Pollack  
Andrew J. Miller  
Kenneth Crowell  
Stuart D. Sender  
Dmitry Shelhoff  
Ajay Kayal  
**Budd Larnar, P.C.**  
150 John F. Kennedy Parkway  
Short Hills, NJ 07078

apollack@buddlarnar.com  
amiller@buddlarnar.com  
kcrowell@buddlarnar.com  
ssender@buddlarnar.com  
dshelhoff@buddlarnar.com  
akayal@buddlarnar.com

Karen A. Confoy  
Erica S. Helms  
**Sterns & Weinroth, P.C.**  
50 W. State St., Suite 1400  
P.O. Box 1298  
Trenton, NJ 08607-1298

kconfoy@sternslaw.com  
ehelms@sternslaw.com

Robert F. Green  
Christopher T. Griffith  
Caryn C. Borg-Breen  
Jessica M. Tyrus  
**Leydig, Voit & Mayer, Ltd.**  
Two Prudential Plaza,  
Suite 4900  
180 N. Stetson Ave.  
Chicago, IL 60601-6731

rgreen@leydig.com  
cgriffith@leydig.com  
cborg-breen@leydig.com  
jtyrus@leydig.com

Anthony W. Shaw  
Joshua Morris  
Richard Berman  
Crystal Canterbury  
**Arent Fox LLP**  
1050 Connecticut Ave. NW  
Washington, DC 20036

Shaw.Anthony@Arentfox.com  
Morris.Joshua@Arentfox.com  
Berman.Richard@Arentfox.com  
Canterbury.Crystal@Arentfox.com

Sean R. Kelly  
**Saiber LLC**  
Suite 200  
Florham Park, NJ 07932

Skelly@saiber.com

Katherine Escanlar  
**Saiber LLC**  
One Gateway Center  
10<sup>th</sup> Floor  
Newark, NJ 07102

kae@saiber.com

By: s/John E. Flaherty  
John E. Flaherty  
Jonathan M. H. Short  
Carissa L. Rodrigue  
MCCARTER & ENGLISH, LLP  
Four Gateway Center  
100 Mulberry Street  
Newark, NJ 07102

*Counsel for Plaintiffs AstraZeneca AB,  
AstraZeneca LP, KBI-E, Inc. and Pozen Inc.*